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11 *Attorneys for Defendant, Hartford Insurance Company of the Midwest*

12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 LESLIE R. BAKKE, AN INDIVIDUAL,

15 Plaintiffs,

16 vs.

17 HARTFORD INSURANCE COMPANY OF
18 THE MIDWEST, DOES 1 THROUGH 10,
19 INCLUSIVE,

20 Defendants.

Case No.: 2:23-cv-01098-GMN-EJY

**STIPULATION TO EXTEND TIME TO
RESPOND TO PLAINTIFF'S FIRST
AMENDED COMPLAINT**

(First Request)

21 Defendant Hartford Insurance Company of the Midwest ("Hartford"), and Plaintiff,
22 Leslie Bakke ("Bakke" or "Plaintiff"), by and through their undersigned counsel of record,
23 hereby submit the following Stipulation to Extend Time to Respond to Plaintiff's First
24 Amended Complaint as follows:

25 WHEREAS, on May 27, 2023, Ms. Bakke, along with dismissed plaintiff, Robert
26 Hamblen ("Hamblen"), filed her Complaint in the Eighth Judicial District Court, Case No. A-23-
27 871428-C [ECF No. 1-1];

28 WHEREAS, on July 14, 2023, Hartford filed a Petition for Removal to this Court [ECF
No. 1];

WHEREAS, Bakke filed her First Amended Complaint on September 8, 2023 [ECF No.
21];

1 WHEREAS, pursuant to FRCP Rule 15(a)(3), the deadline for Hartford to respond to
2 Plaintiff's First Amended Complaint is 14 days after service, or September 22, 2023; and

3 WHEREAS, Hartford's counsel conferred with Plaintiff's counsel regarding an extension
4 of the deadline by two weeks while Hartford reviews the new allegations raised by Bakke and
5 how to respond to them; Wherefore,

6 IT IS HEREBY STIPULATED that Hartford shall be allowed an additional two weeks to
7 file its responsive pleading with the new deadline being October 6, 2023. This is the first request
8 for an extension which is made in good faith and not for purposes of delay.

9 IT IS SO STIPULATED.

10 DATED this 21st day of September, 2023.

DATED this 21st day of September, 2023.

11 WRIGHT, FINLAY & ZAK, LLP

SIDRAN LAW CORP

12 /s/ Stephanie Garabedian

/s/ David R. Sidran

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21 IT IS SO ORDERED:

22 
UNITED STATES MAGISTRATE JUDGE

23 DATED: September 21, 2023